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7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

NO. CV24-909

11 Plaintiff,

12 v.

**VERIFIED COMPLAINT
FOR FORFEITURE *IN REM***

13 APPROXIMATELY 149 LOTS OF
14 STAMPS AND OTHER COLLECTIBLE
15 ITEMS ASSOCIATED WITH INVOICE
16 NUMBERS 33736, 33767, 33786, 33801,
17 AND 33942, SEIZED FROM ROBERT A.
SIEGEL AUCTION GALLERIES, INC.,

Defendants.

20 COMES NOW the United States, by and through its undersigned counsel, and
21 alleges:

22 **I. NATURE OF THE ACTION**

23 1. This is a civil action *in rem*, brought to enforce the provision of 18 U.S.C.
24 § 981(a)(1)(C) for forfeiture of approximately 149 lots of stamps and other collectible
25 items that constitute or are derived from proceeds traceable to a violation of specified
26 unlawful activity as defined in 18 U.S.C. § 1956(c)(7), including but not limited to Mail

1 Fraud (18 U.S.C. § 1341), Wire Fraud (18 U.S.C. § 1343), and Conspiracy to Commit
 2 Mail and Wire Fraud (18 U.S.C. § 1349).

3 2. This is a civil action *in rem*, brought to enforce the provision of 18 U.S.C.
 4 § 981(a)(1)(A) for forfeiture of property that is involved in a transaction or attempted
 5 transaction in violation of 18 U.S.C. §§ 1956 and 1957 (Money Laundering and
 6 Conspiracy to Commit Money Laundering), or any property traceable to such property.

7 **II. PLAINTIFF AND DEFENDANT *IN REM***

8 3. The plaintiff is the United States of America (the “Plaintiff” or
 9 “Government” or “United States”).

10 4. The defendant consists of approximately 149 lots of stamps and other
 11 collectible items associated with invoice numbers 33736, 33767, 33786, 33801, and
 12 33942, redacted copies of which are appended hereto as Attachment 1 and incorporated
 13 by reference, seized by the Federal Bureau of Investigation (FBI) from Robert A. Siegel
 14 Auction Galleries, Inc., on or about February 1, 2024 (the Defendant Property).

15 5. Pursuant to a forfeiture seizure warrant issued in the Western District of
 16 Washington, Cause No. MC24-006, and executed on February 1, 2024, the FBI took
 17 custody of the Defendant Property. The Defendant Property is currently in a special
 18 climate-controlled environment in the physical possession of Robert A. Siegel Auction
 19 Galleries, Inc., where it will remain until the United States Marshals Service executes the
 20 Warrant of Arrest *in Rem*, issued by the Court.

21 **III. JURISDICTION AND VENUE**

22 6. This Court has jurisdiction over an action commenced by the United States
 23 under 28 U.S.C. § 1345 and has jurisdiction over an action for forfeiture under
 24 28 U.S.C. §§ 1335(a) and (b).

25 7. Venue is proper in this district pursuant to 28 U.S.C. § 1335(b)(1)(A)
 26 because acts or omissions giving rise to the forfeiture occurred in this district.

1 8. Pursuant to 18 U.S.C. § 981(f), all right, title, and interest in the
 2 Defendant Property vests in the United States at the time of the acts giving rise to the
 3 forfeiture.

4 9. Pursuant to Supplemental Rule G(2)(f), facts in support of a reasonable
 5 belief that the United States will be able to meet its burden of proof at trial are as follows
 6 and have been verified by the attached Verification of FBI Special Agent Andrew
 7 Cropcho.

8 10. As provided in Supplemental Rule G(3)(b)(i), the Clerk of Court is required
 9 to issue a warrant to arrest the Defendant Property if it is in the government's possession,
 10 custody, or control. As such, the Court will have *in rem* jurisdiction over the Defendant
 11 Property when the accompanying Warrant of Arrest *In Rem* is issued, executed, and
 12 returned to the Court.

IV. SUMMARY OF BASES FOR FORFEITURE

14 11. The United States alleges that the Defendant Property was involved in
 15 transactions and attempted transactions in violation of 18 U.S.C. §§ 1956 and 1957
 16 (Money Laundering) and 1956(h) (Conspiracy to Commit Money Laundering) and
 17 constitutes, or was derived from, proceeds traceable to violations of 18 U.S.C. §§ 1341
 18 (Mail Fraud), 1343 (Wire Fraud) and 1349 (Conspiracy to Commit Mail and Wire
 19 Fraud). The Defendant Property is, therefore, subject to forfeiture pursuant to 18 U.S.C.
 20 §§ 981(a)(1)(A) and (a)(1)(C).

21 12. The Defendant Property was purchased with funds swindled from victims,
 22 including at least one victim in the Western District of Washington, through various
 23 methods, including law enforcement impersonation fraud (Phase 1) and romance fraud
 24 (Phase 2). These methods are described in more detail herein. The funds were laundered
 25 through multiple financial accounts in the names of individuals and entities before being
 26 used to purchase the Defendant Property. Ultimately, though the funds were defrauded
 27 from multiple victims and traveled different paths, they arrived at the same destination.

1 13. These fraud proceeds were deposited, in the form of cashier's checks, into
 2 financial accounts of the Robert A. Siegel Auction Galleries, Inc. (the Gallery).

3 14. The Gallery is an auction company located in New York, which conducts
 4 auctions for "lots" of collector stamps. When a bidder wins an auction for a lot of stamps,
 5 the Gallery issues an invoice for payment for that lot or lots, which identifies the specific
 6 lot number(s), descriptions of the items in the lot(s), and prices. When payments are
 7 made toward an invoice, those payments are also reflected on the invoice.

8 15. Three buyers located in India, designated herein as Buyer 1, Buyer 2, and
 9 Buyer 3, won auctions for the approximately 149 lots of stamps comprising the
 10 Defendant Property. The Gallery issued the following invoice numbers for the lots:
 11 33767 [Buyer 1], 33736 [Buyer 2], 33801 [Buyer 2], 33786 [Buyer 3], and 33942
 12 [Buyer 3]. The total payment due on the five invoices was \$1,383,473. Once the invoices
 13 were paid in full, the Gallery intended to send the stamps to the buyers.

14 16. More than \$1,000,000 of payments applied to these five invoices for the
 15 purchase of the Defendant Property were criminal proceeds defrauded from identified
 16 victims. Most of these victims have been located and interviewed.

17 17. Victims of law enforcement imposter fraud (Phase 1) were conned into
 18 depositing cashier's checks made out to the Gallery directly into the Gallery account or
 19 into sending cashier's checks made out to romance fraud victims. The law enforcement
 20 impersonators falsely led the Phase 1 Victims to believe their funds would be returned to
 21 them after the purported legal issue was resolved.

22 18. Some law enforcement imposter fraud victims (Phase 1) sent cashier's
 23 checks to romance fraud victims (Phase 2). The Phase 2 Victims deposited those checks,
 24 purchased cashier's checks payable to the Gallery, and deposited the new cashier's
 25 checks into the Gallery account. The romance scammers falsely led the Phase 2 Victims
 26 to believe they were assisting with legitimate money transfers, rather than being tricked
 27 into helping launder proceeds defrauded from the Phase 1 Victims.

19. In some instances, funds used by Phase 2 Victims to purchase cashier's checks payable to the Gallery were defrauded from more than one victim.

20. Phase 1 (law enforcement imposter fraud) Victims are referred to herein as “Victim 1,” “Victim 2,” *etc.*, and Phase 2 (romance fraud) Victims, are referred to as “Alpha,” “Bravo,” *etc.*

Phase One Victims

21. The 18 victims of Phase 1, whose fraudulently obtained funds were deposited into the Gallery account, either directly or via Phase 2 Victims, are identified in

Table 1. Victim 1 resides in the Western District of Washington.

PHASE ONE VICTIMS	
Initials	Designator
WM	Victim 1
JM	Victim 2
GR	Victim 3
DF	Victim 4
HJ	Victim 5
EB	Victim 6
MS	Victim 7
IR	Victim 8
SiH	Victim 9
CM	Victim 10
MH	Victim 11
DeO	Victim 12
HG	Victim 13
DO	Victim 14
JH	Victim 15
JO	Victim 16
DS	Victim 17
BL	Victim 18

Table 1

Phase One Victim Funds Deposited Directly to Gallery Account

22. Two law enforcement imposter fraud victims (Phase 1) purchased cashier's checks payable to the Gallery and deposited those checks into the Gallery account. Most

1 of the funds from these cashier's checks were credited to the invoices for the Defendant
 2 Property, as reflected in **Table 2**. Victim 2 deposited a \$199,500 cashier's check into the
 3 Gallery Account, of which, \$149,500 was applied to invoices for purchase of the
 4 Defendant Property. All funds defrauded from Victim 11 were applied to these invoices.

PHASE ONE VICTIMS			
Initials	Designator	Proceeds to Gallery	Applied to Defendant Property Invoices
JM	Victim 2	\$199,500	\$149,500
MH	Victim 11	\$93,000	\$93,000
		\$292,500	\$242,500

10 **Table 2**11 ***Phase Two Victim Funds Deposited Directly to Gallery Account***

12 23. Ten romance fraud victims (Phase 2), identified in **Table 3**, deposited
 13 cashier's checks they received from Phase 1 Victims, purchased new cashier's checks
 14 payable to the Gallery, and deposited the new checks into the Gallery account.

PHASE TWO VICTIMS		
Initials	Designator	Proceeds to Gallery
RG	Alpha	\$107,500
AS	Bravo	\$39,100
RT	Charlie	\$86,400
SyH	Delta	\$20,000
DW	Echo	\$125,700
LE	Foxtrot	\$24,900
KT	Golf	\$66,600
TH	Hotel	\$47,000
GB	Indigo	\$193,200
JW	Juliet	\$59,400
		\$769,800

26 **Table 3**

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1 ***Total Victim Cashier's Checks Deposited Directly to the Gallery Account***

2 24. The makers of the cashier's checks deposited to the Gallery account and
 3 applied to invoices for the purchase of the Defendant Property are depicted in **Table 4**.

CASHIER'S CHECKS DEPOSITED TO GALLERY ACCOUNT			
Initials	Phase	Designator	Deposited
JM	1	Victim 2	\$149,500
MH	1	Victim 11	\$93,000
RG	2	Alpha	\$107,500
AS	2	Bravo	\$39,100
RT	2	Charlie	\$86,400
SyH	2	Delta	\$20,000
DW	2	Echo	\$125,700
LE	2	Foxtrot	\$24,900
KT	2	Golf	\$66,600
TH	2	Hotel	\$47,000
GB	2	Indigo	\$193,200
JW	2	Juliet	\$59,400
			\$1,012,300

16 **Table 4**

17 ***Fraud Proceeds Applied to Invoices***

18 25. **Table 5** depicts the identified proceeds defrauded from victims that were
 19 applied to each invoice for the Defendant Property.

FRAUD PROCEEDS APPLIED TO INVOICES			
Invoice	Total Invoice	Fraud Proceeds Applied	% of Fraud Proceeds v. Total Invoice
33942	\$73,868.00	\$73,868.00	100%
33786	\$198,821.00	\$175,043.81	88%
33736	\$381,939.00	\$218,057.19	57%
33801	\$128,611.00	\$128,611.00	100%
33767	\$600,234.00	\$416,720.00	69%
TOTAL	\$1,383,473.00	\$1,012,300.00	

27 **Table 5**

1 **Buyer 1 Controlled Which Victim Funds Were Applied to Each Invoice**

2 26. Buyer 1 directed the Gallery to apply these fraud proceeds to each of the
3 invoices for the Defendant Property, including the invoices for purchases by Buyer 2 and
4 Buyer 3. An example of one of these communications from Buyer 1 to the Gallery,
5 directing funds deposited by Victim 11 to Invoices 33736 (purchased by Buyer 1) and
6 33767 (purchased by Buyer 2) appears below:

7

8 Dear [REDACTED]

9 I hope you are doing well.

10 Please confirm details of my last email dated 27th July and share the requested statements.

11 Further, another payment of 93,000 was credited to the account today. Kindly confirm.

12 Out of the above please split it in this manner -

13 Invoice 033767 - 54,000
14 Invoice 033736 - 39,000

15 Once above figures are applied also share statements of Invoice 033767 & 033736

16 regards,

17 P [REDACTED]

18 27. Victim funds were applied to multiple invoices, for the benefit of multiple
19 buyers, consistent with a unified scheme to defraud the victims and disguise the proceeds
20 of that fraud.

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1 28. The following tables identify the invoices to which fraud proceeds were
 2 applied, arranged by invoice (**Table 6**) and Victim (**Table 7** and **Table 8**).

Invoice #	Buyer	Phase 1 Victim	Phase 2 Victim
33767	Buyer 1	Victim 1	Alpha
		Victim 2	Direct Payment
		Victim 2	Alpha
		Victim 3	Alpha
		Victim 5	Bravo
		Victim 6	Charlie
		Victim 7	Delta
		Victim 8	Echo
		Victim 10	Foxtrot
		Victim 11	Direct Payment
33736	Buyer 2	Victim 13	Golf
		Victim 18	Golf
		Victim 1	Alpha
		Victim 6	Charlie
		Victim 9	Echo
		Victim 11	Direct Payment
33801	Buyer 2	Victim 14	Hotel
		Victim 15	Indigo
		Victim 16	Indigo
33786	Buyer 3	Victim 4	Alpha
		Victim 15	Indigo
		Victim 16	Indigo
		Victim 17	Juliet
		Victim 2	Direct Payment
		Victim 7	Delta
33942	Buyer 3	Victim 8	Echo
		Victim 14	Hotel
		Victim 16	Indigo
		Victim 17	Juliet

Table 6

Phase 1 Victim	Invoice #	Buyer Name
Victim 1	33736	Buyer 2
	33767	Buyer 1
Victim 2	33767	Buyer 1
	33786	Buyer 3
	33942	Buyer 3
Victim 3	33767	Buyer 1
Victim 4	33801	Buyer 2
Victim 5	33767	Buyer 1
Victim 6	33736	Buyer 2
	33767	Buyer 1
Victim 7	33767	Buyer 1
	33786	Buyer 3
Victim 8	33767	Buyer 1
	33786	Buyer 3
Victim 9	33736	Buyer 2
Victim 10	33767	Buyer 1
Victim 11	33736	Buyer 2
	33767	Buyer 1
Victim 13	33767	Buyer 1
Victim 14	33736	Buyer 2
	33786	Buyer 3
Victim 15	33736	Buyer 2
	33801	Buyer 2
	33942	Buyer 3
Victim 16	33786	Buyer 3
	33801	Buyer 2
	33942	Buyer 3
Victim 17	33786	Buyer 3
	33942	Buyer 3
Victim 18	33767	Buyer 1

Table 7

Phase 2 Victim	Invoice #	Buyer Name
Alpha	33767	Buyer 1
	33801	Buyer 2
	33736	Buyer 2
Bravo	33767	Buyer 1
Charlie	33767	Buyer 1
	33736	Buyer 2
Delta	33767	Buyer 1
	33786	Buyer 3
Echo	33767	Buyer 1
	33736	Buyer 2
	33786	Buyer 3
Foxtrot	33767	Buyer 1
Golf	33767	Buyer 1
Hotel	33736	Buyer 2
	33786	Buyer 3
Indigo	33736	Buyer 2
	33801	Buyer 2
	33786	Buyer 3
	33942	Buyer 3
Juliet	33786	Buyer 3
	33942	Buyer 3

Table 8

29. The perpetrators of this fraud scheme engaged in sophisticated, many-layered, transactions to conceal and disguise the nature, location, source, ownership, or control of the proceeds defrauded from these victims. They directed victims to obtain cashier's checks, payable either directly to the Gallery and deposited to the Gallery account or payable to other persons, who deposited those checks, purchased additional cashier's checks payable to the Gallery and deposited them to the Gallery account. They directed the Gallery to apply funds from those cashier's checks toward the identified invoices, thus disguising the proceeds of the underlying fraud as legitimate payments

1 against invoices for the purchase of legitimate assets, through a legitimate auction house.
 2 Finally, the proceeds were transformed from funds into stamps – the Defendant Property.

3 **V. PURPOSE OF FORFEITURE**

4 30. The purpose of this forfeiture action *in rem* is two-fold. First, forfeiture of
 5 the Defendant Property provides a means for the United States to return funds defrauded
 6 from victims. Second, forfeiture deters criminal activity by forfeiting and vesting title of
 7 the Defendant Property with the United States, so criminals do not keep fruits of crime or
 8 property that facilitated or was involved in crime.

9 **VI. THE LAW**

10 31. An individual commits Mail Fraud when, “having devised or intending to
 11 devise any scheme or artifice to defraud ... [the individual] places in any post office or
 12 authorized depository for mail matter, any matter or thing whatever to be sent or
 13 delivered by the Postal Service [or any private or commercial interstate carrier], or takes
 14 or receives therefrom, any such matter or thing” 18 U.S.C. § 1341. Mail Fraud
 15 requires the existence of a scheme to defraud, the use of the mails to carry out or attempt
 16 to carry out that scheme, and a specific intent to defraud. It does not matter whether the
 17 material mailed was itself false or deceptive so long as the mail was used as part of the
 18 scheme or “a step in the plot.” *See Schmuck v. United States*, 489 U.S. 705, 712 (1989);
 19 *see also United States v. Lo*, 231 F.3d 471, 478 (9th Cir. 2000); *United States v.*
 20 *Hubbard*, 96 F.3d 1223, 1228-29 (9th Cir. 1996). Mailings designed to avoid detection or
 21 responsibility for a fraudulent scheme, even if sent after the proceeds of the fraud have
 22 been obtained, are sufficient if they are sent prior to the scheme’s completion. *See United*
 23 *States v. Tanke*, 743 F.3d 1296, 1305 (9th Cir. 2014). Success of the scheme is
 24 immaterial. *See United States v. Rude*, 88 F.3d 1538, 1547 (9th Cir. 1996).

25 32. Pursuant to 18 U.S.C. § 1349, it is unlawful to attempt or conspire to
 26 commit a violation of 18 U.S.C. § 1341.

1 33. An individual commits Wire Fraud when, “having devised or intending to
 2 devise any scheme or artifice to defraud... [the individual] transmits or causes to be
 3 transmitted by means of wire...communication in interstate or foreign commerce, any
 4 writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or
 5 artifice.” 18 U.S.C. § 1343. Wire Fraud requires the existence of a scheme to defraud, the
 6 use of a wire to further that scheme, and a specific intent to defraud. *See United States*
 7 *v. Pelisamen*, 641 F.3d 399, 409 (9th Cir. 2011). A wire communication is “in
 8 furtherance” of a fraudulent scheme if it is “incident to the execution of the scheme.”
 9 *See United States v. Jinian*, 725 F.3d 954, 960, citing *United States v. Lo*, 231 F.3d 471,
 10 478 (9th Cir. 2000).

11 34. Pursuant to 18 U.S.C. § 1349, it is unlawful to attempt or conspire to
 12 commit a violation of 18 U.S.C. § 1343.

13 35. An individual commits Conspiracy to Commit Mail Fraud or Wire Fraud
 14 when the individual enters into an agreement between two or more persons to commit
 15 Mail Fraud or Wire Fraud, knowing of at least one object of the conspiracy, and
 16 intending to help accomplish it. *See* 18 U.S.C. § 1349. A “conspiracy” is an agreement by
 17 two or more persons to commit an unlawful act. In other words, it is a kind of partnership
 18 from criminal purposes. Every member of the conspiracy becomes the agent or partner of
 19 every other member. No overt act is required by Section 1349. *See United States v.*
 20 *Shabani*, 513 U.S. 10, 12 (1994); *see also United States v Ehmer*, 87 F.4th 1073, 1115
 21 (9th Cir. 2023), citing *United States v. Thompson*, 990 F.3d 680, 683-84 (9th Cir. 2021)
 22 (holding that an indictment’s inclusion of unnecessary allegations of “overt acts” in
 23 charging a wire-fraud conspiracy offense under 18 U.S.C. § 1349 did not mean that the
 24 indictment should be construed as instead relying on the general conspiracy statute,
 25 18 U.S.C. § 371, which (unlike § 1349) requires an overt act).

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1 36. Mail Fraud, Conspiracy to Commit Mail Fraud, Wire Fraud, and
 2 Conspiracy to Commit Wire Fraud, are “specified unlawful activities” pursuant to
 3 18 U.S.C. § 1961(1)(B).

4 37. Pursuant to 18 U.S.C. § 981(a)(1)(C), “[a]ny property, real or personal,
 5 which constitutes or is derived from proceeds traceable to a violation of . . . any offense
 6 constituting a ‘specified unlawful activity’ (as defined in section 1956(c)(7) of this title),
 7 or a conspiracy to commit such offense” is subject to forfeiture to the United States.

8 38. A person commits Money Laundering in violation of 18 U.S.C.
 9 § 1956(a)(1) when the person knowingly conducts, or attempts to conduct, a financial
 10 transaction with proceeds from specified unlawful activity, with intent to promote the
 11 specified unlawful activity or evade taxes, or knowing the transaction is designed in
 12 whole or in part to conceal or disguise the nature, location, source, ownership, or control
 13 of the proceeds or to avoid transaction reporting requirements. *See* 18 U.S.C. § 1956.

14 39. A person commits Money Laundering in violation of 18 U.S.C. § 1957
 15 when the person engages, or attempts to engage, in a monetary transaction with proceeds
 16 of a specified unlawful activity in an amount greater than \$10,000 by, through, or to a
 17 financial institution. 18 U.S.C. § 1957.

18 40. A person commits Conspiracy to Commit Money Laundering in violation
 19 of 18 U.S.C. § 1956(h) when the person joins an agreement to commit Money
 20 Laundering, knowing the object of the agreement, and with the intent to further its
 21 unlawful purpose. *See* 18 U.S.C. § 1956(h); *see also United States v. Jaimez*, 45 F.4th
 22 1118, 1123 (9th Cir. 2022). No overt act is required by Section 1956(h). *See Whitfield v.*
 23 *United States*, 543 U.S. 209, 219 (2005).

24 41. Pursuant to 18 U.S.C. § 981(a)(1)(A), “[a]ny property, real or personal,
 25 involved in a transaction or attempted transaction in violation of [a federal money
 26 laundering offense, 18 U.S.C. § 1956], or any property traceable to such property” is
 27 subject to forfeiture to the United States.

1 **VII. SCHEME TO DEFRAUD AND FINANCIAL TRACING**

2 42. This case involves fraud perpetrated on victims across the United States,
 3 including in the Western District of Washington, in which the perpetrators convinced
 4 victims to transfer their funds, or the funds of other victims, to the Gallery for the benefit
 5 of persons located in India. The victims are deceived into making the financial transfers
 6 through various methods, including law enforcement impersonation fraud (Phase 1) and
 7 romance fraud (Phase 2).

8 43. The law enforcement impersonation fraud generally started with a phone
 9 call from someone pretending to be a government employee. The prospective victim was
 10 informed that their personal information had been compromised and that they had to
 11 protect their funds by sending them to secure locations. The law enforcement
 12 impersonator falsely led the victim to believe their funds would be returned once
 13 everything was resolved. In this case, the perpetrators of the fraud primarily impersonated
 14 FBI, FTC, and DOJ employees. Some victims (Victims 2 and 11) sent cashier's checks in
 15 their own names for deposit directly to the Gallery account (Phase 1). Other victims
 16 (Victims 1-10, 12-18) purchased a cashier's check in their own names, payable to a
 17 second person, and sent the check to that person (Phase 1). The second person deposited
 18 the check, purchased a new cashier's check in their name, payable to the Gallery, and
 19 sent the new cashier's check for deposit in the Gallery account (Phase 2). The individuals
 20 engaging in the Phase 2 activities were typically romance fraud victims.

21 44. The romance fraud generally started when a victim met a scammer online.
 22 After building rapport and trust with the victim, the scammer convinced the victim to
 23 transfer funds, at the direction of the scammer or a purported associate, allegedly to help
 24 pay debts owed by the scammer, or to move funds for investment or inheritance purposes.
 25 The scammer typically falsely led the victim to believe they were assisting with
 26 legitimate money transfers, rather than helping launder funds defrauded from victims of
 27 the law enforcement impersonation fraud.

1 45. The perpetrators engaged in layered financial transactions designed, in
 2 whole or in part, to conceal and disguise the nature, location, source, ownership, or
 3 control of the proceeds. Many of these transactions involved more than \$10,000 of fraud
 4 proceeds.

5 46. This Complaint does not include all of the financial analysis performed, but
 6 focuses on the tracing of specific funds from victims into the Defendant Property, to
 7 demonstrate the concerted efforts to launder and obfuscate the flow of victim funds to the
 8 perpetrators of the fraud.

9 ***Victim 1 and Alpha***

10 47. Victim 1, a resident of Western Washington, received a call from a person
 11 who identified himself as Mark [Last Name Unknown] (“Mark”). Mark said that he was
 12 an FBI employee and informed Victim 1 that one of their financial accounts had been
 13 compromised. Mark instructed Victim 1 to send all of their money to Mark for safe-
 14 keeping, for about five to 10 days.

15 48. Mark also informed Victim 1 that funds in another account were also at
 16 risk, so Victim 1 needed to transfer the money from that account to Mark as well, so he
 17 could monitor the funds. Mark instructed Victim 1 to buy a cashier’s check for \$300,000,
 18 payable to Alpha. On or about August 3, 2023, Victim 1 purchased the cashier’s check
 19 and mailed it to Alpha, as instructed.

20 ***Alpha***

21 49. Alpha resides in Georgia and is one of the romance fraud victims. Alpha
 22 opened accounts at financial institutions, deposited cashier’s checks sent by law
 23 enforcement imposter fraud (Phase 1) Victims 1-4 into these accounts, purchased new
 24 cashier’s checks payable to the Gallery, and deposited them to the Gallery account. Alpha
 25 used accounts at multiple financial institutions for this purpose.

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1 50. Alpha met someone using the name Stella Brooks (“Brooks”), on an online
 2 dating app. Alpha and Brooks only communicated through the dating app and on Google
 3 Chat. Alpha never met Brooks in person, but Alpha believed they were in love and would
 4 get married.

5 51. Brooks told Alpha that she used to live in the United States, but she
 6 currently lives in Ghana, Africa. In the fall of 2022, Brooks told Alpha that her father
 7 died, and she would be the beneficiary of a large gold inheritance. Brooks said that Alpha
 8 would also benefit from the gold once they got married.

9 52. Brooks introduced Alpha to someone who used the name Arnold Peiffer
 10 (“Peiffer”), who Alpha believed was Brooks’ attorney. In turn, Peiffer introduced Alpha
 11 to someone claiming to be Scott Ardolf (“Ardolf”), the investment advisor overseeing
 12 Brooks’ gold inheritance. Alpha never met Peiffer or Ardolf in person. Ardolf used the
 13 same phone number (“the scam phone”) that was used to contact at least five victims of
 14 romance fraud: Alpha, Echo, Foxtrot, Golf, and Hotel.

15 53. Ardolf instructed Alpha to pick up cashier’s checks delivered to a local
 16 UPS Store, deposit them, and purchase new cashier’s checks. Ardolf instructed Alpha to
 17 either mail the cashier’s checks to others or to deposit them into a bank account. Ardolf
 18 led Alpha to believe the funds were coming from gold investors, and that everyone would
 19 eventually be repaid.

20 54. Alpha opened an account ending x2325 at one financial institution on or
 21 about August 4, 2023 (“Alpha’s x2325 account”), into which Alpha made a deposit of
 22 \$100. The next deposit to this account was the \$300,000 cashier’s check purchased by
 23 Victim 1. There were debits from, but no other deposits to, Alpha’s x2325 account before
 24 August 21, 2023, when Alpha purchased a \$27,000 cashier’s check, payable to the
 25 Gallery. The funds Alpha used to purchase this cashier’s check were defrauded from
 26 Victim 1. \$5,580 of the funds from the \$27,000 cashier’s check were applied to Invoice
 27 33736 (Buyer 2) and \$21,420 were applied to Invoice 33767 (Buyer 1).

1 ***Victim 2 and Alpha***

2 55. Victim 2 is a resident of Maryland. On July 24, 2023, Victim 2 purchased a
 3 cashier's check in the amount of \$199,500.15, payable to the Gallery, after falling victim
 4 to the law enforcement impersonation fraud. A perpetrator or perpetrators pretending to
 5 be government officials convinced Victim 2 that their private information had been
 6 compromised, they needed to deposit money in a secure location (the Gallery), and they
 7 would receive the money back after receiving a new social security number.

8 56. \$149,500.00 of Victim 2's \$199,500.16 cashier's check was applied to the
 9 following invoices: \$24,600 to Invoice 33942 (Buyer 3); \$64,900 to Invoice 33786
 10 (Buyer 3); and \$60,000 to Invoice 33767 (Buyer 2). All of these funds are proceeds
 11 defrauded from Victim 2. The remaining \$50,000 was applied to an invoice associated
 12 with a different purchase.

13 57. On or about June 14, 2023, Victim 2 purchased a \$35,000 cashier's check
 14 and sent it to Alpha. Alpha deposited that check into an account ending x8216, in a
 15 different financial institution ("Alpha's x8216 account") and, on July 11, 2023, purchased
 16 a \$45,500 cashier's check payable to the Gallery from Alpha's x8216 account, which was
 17 applied to Invoice 33767 (Buyer 2). Approximately \$421.23 of the funds used to
 18 purchase the \$45,500 cashier's check were defrauded from Victim 2. The remaining
 19 \$45,078.77 was defrauded from Victim 3, as described below.

20 ***Victim 3 and Alpha***

21 58. Victim 3, a resident of New York, received a telephone call from someone
 22 identifying himself as Michael [Last Name Unknown] ("Michael"). Michael instructed
 23 Victim 3 to make out a check for \$46,300 to pay what they owed and mail it to Alpha, or
 24 Victim 3 would be arrested. Victim 3 purchased a \$46,300 cashier's check and mailed it
 25 to Alpha.

26 59. On June 14, 2023, when Alpha's x8216 account held only \$100, Victim 2's
 27 \$35,000 cashier's check (discussed above in paragraph 57) was deposited into the

1 account. The next transaction was a June 23, 2023 purchase of a \$34,400 cashier's check
 2 payable to a third party. Between June 26, 2023 and June 27, 2023, Alpha made five
 3 retail purchases for a total of \$278.77. After these purchases, the balance in Alpha's
 4 x8216 account, comprised of the remaining funds from Victim 2, was \$421.23.

5 60. On June 29, 2023, when Alpha's x8216 account balance was still \$421.23,
 6 Victim 3's \$46,300 cashier's check was deposited to the account. Between June 29, 2023
 7 and July 11, 2023, the only other deposit into the account was a \$1.49 interest payment.
 8 On July 11, 2023, Alpha purchased a \$45,500 cashier's check payable to the Gallery.

9 61. The entire \$45,500 was applied to Invoice 33767 (Buyer 1). This \$45,500
 10 cashier's check was purchased with funds defrauded from Victim 2 (\$421.23) and
 11 Victim 3 (\$45,078.77).

12 62. Buyer 1 reminded the Gallery to apply the \$45,500 payment in an email
 13 message sent on July 18, 2023:

14 On Tue, 18 Jul 2023 at 8:23 PM, [REDACTED] > wrote:
 15 Dear [REDACTED]
 16 The invoice which you have sent me, you have not applied 45,500 which was sent on 12th July. Please check my email
 17 of 12th July
 18 Please update the same and resend the invoice.
 19 Regards,
 [REDACTED]

20 *Victim 4 and Alpha*

21 63. Victim 4, a resident of Louisiana, received a call from someone purporting
 22 to be from a major retail company, claiming that someone was attempting to make a large
 23 purchase using Victim 4's card. This person transferred Victim 4 to someone claiming to
 24 be Alan Fitch, in the Federal Trade Commission's (FTC) financial crimes unit ("Fitch").

25 64. Fitch told Victim 4 that they were being investigated because their SSN
 26 was found in a house in Albany, New York, along with eight fraud accounts in their
 27 name. Fitch said that Homeland Security would be pressing charges against Victim 4,

1 including conspiracy against America for money laundering, fraud, and terrorism. Fitch
 2 told Victim 4 that they would try to change their SSN, but in the meantime, Victim 4
 3 needed to send some of the funds in their bank account for safe-keeping at the FTC while
 4 the government determined what was happening. Victim 4 was assured the funds would
 5 be returned. Victim 4 purchased a \$45,900 cashier's check and sent it to Alpha.

6 65. Alpha deposited Victim 4's \$45,900 cashier's check into Alpha's x8216
 7 account on or about September 8, 2023. Between the deposit of Victim 3's check on June
 8 29, 2023 and the deposit of Victim 4's check on September 8, 2023, Alpha's x8216
 9 account never reached \$0.00 and only received two deposits, which consisted of two
 10 interest payments totaling \$1.33. Prior to the deposit of Victim 4's check, the balance in
 11 Alpha's x8216 account was \$94.22. Subsequently, Alpha made one retail purchase and,
 12 on September 13, 2023, purchased an official check for \$35,000, payable to the Gallery.
 13 The official check, which was purchased with at least \$34,905 defrauded from Victim 4,
 14 was applied to Invoice 33801 (Buyer 2).

15 ***Victim 5 and Bravo***

16 66. Victim 5 is a resident of West Virginia. Victim 5 was contacted by
 17 someone purporting to be from the fraud department of a financial institution, then
 18 transferred to someone claiming to be the Chief Investigator of the FTC. The purported
 19 FTC investigator informed Victim 5 their SSN was tied to child pornography rings and
 20 they needed to send a cashier's check for \$39,800 to Bravo, in New Mexico. On June 6,
 21 2023, after sending the cashier's check to Bravo, Victim 5 received an email message that
 22 appeared to be from the Department of the Treasury, informing them that the funds
 23 would be returned once the FTC's investigation was concluded.

24 67. Bravo is a resident of New Mexico. Bravo opened an account at a financial
 25 institution on or about May 24, 2023 and deposited \$50. The next transaction was the
 26 May 26, 2023 deposit of Victim 5's \$39,800 cashier's check. The next transactions
 27 occurred on June 9, 2023: the withdrawal of \$400 and the purchase of a \$39,100 cashier's

1 check, payable to the Gallery. The \$39,100 cashier's check was purchased entirely from
2 funds defrauded from Victim 5. On June 12, 2023, the \$39,100 cashier's check was
3 deposited into the Gallery's financial account and applied to Invoice 33767 (Buyer 1).

4 68. On June 13, 2023, Buyer 1 informed the Gallery that this check had been
5 deposited and directed the Gallery to apply the funds to Invoice 33767. The Gallery
6 confirmed:

7 **From:** [REDACTED]
8 **Sent:** Tuesday, June 13, 2023 12:24 PM
9 **To:** [REDACTED]
10 **Subject:** Re: payment reminder - Inv 033736 / 033767 - S1286

11 ***EXTERNAL EMAIL***

12 Dear [REDACTED],

13 Please note that a payment of 39,100 was made yesterday to your account.

14 Kindly apply it to invoice 033767. More to follow soon.

15 Please confirm receipt.

16 Regards,
[REDACTED]

17 On Tue, Jun 13, 2023 at 11:00 PM [REDACTED] <[REDACTED]@siegelauctions.com> wrote:

18 Dear [REDACTED]

19 This confirms that we received your check # 161733 for \$39,100.00 on 06/13/23, which was applied to invoice #
033767 for Sale 1286.

20 Thank you for the payment you made today, and it was a pleasure assisting you.

21 We value you as an excellent client and look forward to doing more business with you.

22 Regards,
[REDACTED]

23
24
25
26 Financial Administrator
27 Siegel Auction Galleries, Inc.

1 ***Victim 6 and Charlie***

2 69. Victim 6, a resident of California, was contacted by a perpetrator or
 3 perpetrators claiming their personal and banking information had been compromised and
 4 they needed to protect their money by buying gift cards. Shortly thereafter, Victim 6 was
 5 contacted by another person, who confirmed that Victim 6's money needed protecting,
 6 but said that they should send cashier's checks via UPS to different individuals. Victim 6
 7 was deceived into believing this money would be stored in lockers and returned once
 8 their information was no longer compromised. On June 27, 2023, at the perpetrator's
 9 direction, Victim 6 purchased a cashier's check in the amount of \$271,000, payable to an
 10 LLC associated with Charlie, and sent it to Charlie, in Colorado. Several months later
 11 Victim 6 purchased a \$293,400 cashier's check, also payable to Charlie.

12 70. Charlie, a resident of Colorado, is a victim of romance fraud. Charlie was
 13 contacted by a perpetrator who told Charlie she inherited a large amount of property in a
 14 foreign country, but needed to pay for fees, taxes, and shipping to bring the property to
 15 the United States. She told Charlie that investors would pay these expenses, by sending
 16 money to Charlie. She introduced Charlie to Scott [Last Name Unknown] ("Scott"), who
 17 provided directions to Charlie concerning these payments. Scott opened a financial
 18 account for Charlie in the name of the LLC. Charlie picked up cashier's checks they
 19 believed to be investor funds from a UPS store, and deposited them into various bank
 20 accounts, at Scott's direction. One of these cashier's checks was Victim 6's \$271,000
 21 cashier's check. Charlie deposited Victim 6's check into the LLC account, then
 22 purchased an \$86,000 cashier's check, payable to the Gallery. All of the funds used to
 23 purchase the cashier's check to the Gallery are proceeds defrauded from Victim 6.
 24 \$50,000 of the funds from this cashier's check were applied to Invoice 33736 (Buyer 2)
 25 and \$36,400 was applied to Invoice 33767 (Buyer 1).

26 //

27 //

1 71. Charlie has facilitated payments for the individual Charlie met online for
 2 about six years. These payments total approximately \$1,500,000. Charlie also sent
 3 approximately \$8,000 of Charlie's own money at this individual's direction.

4 ***Victim 7 and Delta***

5 72. Delta is a resident of Illinois, who was contacted on social media by a
 6 person using the name Irene Lawson ("Lawson"). Lawson asked Delta to receive money
 7 on her behalf and then make payments to others, using cashier's checks, to pay off
 8 Lawson's father's debt. Sometimes Lawson made threats of physical violence to coerce
 9 Delta into executing the money transfers. On June 28, 2023, when the balance in Delta's
 10 account was \$5.45, Delta deposited a cashier's check for \$22,100, purchased by Victim 7.
 11 Victim 7 is a resident of Oklahoma. The next two transactions in Delta's account
 12 happened on June 30, 2023: a withdrawal of \$2,000 and a dividend of \$0.53.

13 73. On July 12, 2023, Delta purchased an official check for \$20,000, payable to
 14 the Gallery. There were no intervening transactions in Delta's account, so the official
 15 check was purchased with funds from Victim 7's cashier's check. \$17,900 of these funds
 16 were allocated to Invoice 33767 (Buyer 1) and \$2,100 of the funds were allocated to
 17 Invoice 33786 (Buyer 3).

18 ***Victim 8, Victim 9, and Echo***

19 74. Victim 8, a resident of Louisiana, was contacted by someone purporting to
 20 be from the FBI, who said the FBI just raided a residence in New Jersey, where Victim
 21 8's personal information was found. Victim 8 was informed that a group was going to
 22 steal their money and, to keep it safe, Victim 8 needed to send their money to the person
 23 purporting to be from the FBI. On or about May 16, 2023, Victim 8 purchased and
 24 mailed a \$144,900 cashier's check, payable to Echo. On or about June 6, 2023, Victim 8
 25 purchased and mailed a \$169,200 cashier's check, also payable to Echo.

26 75. Victim 9 is a resident of Pennsylvania. Victim 9 was contacted in or around
 27 July 2023 by someone purporting to be a local police chief, who told them there was an

1 arrest warrant out for money laundering, and Victim 9 needed to send money at the
 2 direction of the local police chief. Victim 9 also received calls from people claiming to be
 3 representatives of the FBI and FTC. As directed, Victim 9 sent funds to what they
 4 believed were government accounts in their name, which would be returned once it was
 5 determined that their money was not involved in money laundering. On July 24, 2023,
 6 Victim 9 purchased a \$28,000 cashier's check, payable to Echo and sent it to Echo.

7 76. Echo, a resident of North Carolina, is a romance fraud victim. Echo met
 8 someone online who said her name was Nicole ("Nicole"). Through Nicole, Echo was
 9 introduced to someone who claimed to be Scott Ardous ["Ardous"], an employee at a law
 10 firm helping with Nicole's trust account. Ardous contacted Echo using the scam phone
 11 number also used to contact Alpha, Foxtrot, Golf, and Hotel. Ardous told Echo that
 12 Nicole's trust account was funded by an inheritance from Nicole's father but that Nicole
 13 could not access the inheritance until taxes and other fees were paid.

14 77. Echo received and sent funds at the direction of Ardous.

15 a. On June 7, 2023, Echo deposited the \$169,200 official check
 16 purchased by Victim 8. Immediately prior, the balance in Echo's account was \$108.37.
 17 On June 16, 2023, when the balance in the account was \$168,602, entirely comprised of
 18 funds from Victim 8's check, Echo purchased a \$98,000 official check, payable to the
 19 Gallery. \$50,900 of these funds were allocated to Invoice 33767 (Buyer 1); \$47,100 of
 20 the funds were allocated to Invoice 33786 (Buyer 3).

21 b. On July 27, 2023, Echo deposited Victim 9's \$28,000 cashier's
 22 check into one of Echo's bank accounts. The balance in Echo's account immediately
 23 before this deposit was \$3.02, the source of which is unknown. Between this deposit and
 24 August 7, 2023, Echo's account received five credits: a direct deposit from the Social
 25 Security Administration for \$2,491.00 and four ATM fee refunds totaling \$11.50. There
 26 were also 17 debits to the account. Sixteen were retail transactions, ATM withdrawals,
 27 and one check for \$800; these withdrawals totaled \$2,343.05. The remaining withdrawal

1 on August 7, 2023 was for the purchase of a \$19,000 official check, payable to the
 2 Gallery. On August 8, 2023, Echo purchased a second official check for \$8,700, also
 3 payable to the Gallery. Approximately \$17,861.87 of the funds Echo used to purchase the
 4 first official check and all of the funds used to purchase the second official check were
 5 defrauded from Victim 9. All of these funds were applied to Invoice 33736 (Buyer 2).

6 ***Victim 10 and Foxtrot***

7 78. In June or July of 2023, Victim 10, a resident of Montana, received a call
 8 from someone claiming to be David Smith (“Smith”), who directed Victim 10 to send
 9 money to a trust account. Smith told Victim 10 the money would later be reimbursed. In
 10 August 2023, Victim 10 sent a \$25,800 cashier’s check to Foxtrot.

11 79. Foxtrot, a resident of Arizona, met someone online who used the name
 12 Carla MacBrown (“MacBrown”). MacBrown told Foxtrot that she was opening a
 13 business and she needed help receiving her inheritance money so she could get it started.
 14 MacBrown told Foxtrot that she could not receive the inheritance proceeds because of a
 15 loan that she had to pay off, so she asked Foxtrot to receive the inheritance proceeds on
 16 her behalf. MacBrown put Foxtrot in contact with someone claiming to be Argos Scott
 17 (“Argos”), who would help Foxtrot make the transfers. Argos contacted Foxtrot using the
 18 same scam phone number used to contact Alpha, Echo, Golf, and Hotel. The “inheritance
 19 checks” Foxtrot received included Victim 10’s \$25,800 cashier’s check. Argos instructed
 20 Foxtrot to deposit Victim 10’s check and send the proceeds to the Gallery.

21 80. Foxtrot opened a bank account on August 3, 2023. The first transaction was
 22 deposit of Victim 10’s check on August 14, 2023. On August 21, 2023, Foxtrot
 23 purchased a \$19,000 cashier’s check, payable to the Gallery. The following day, Foxtrot
 24 purchased a \$5,900 cashier’s check payable to the Gallery. Foxtrot’s account received no
 25 credits during this period other than the Victim 10’s check. The value of both checks
 26 (\$24,900), all of which was defrauded from Victim 10, was applied to Invoice 33767
 27 (Buyer 1).

1 **Victim 11**

2 81. Victim 11, a resident of West Virginia, purchased a cashier's check in the
 3 amount of \$93,000 payable to the Gallery. This cashier's check was deposited into a
 4 Gallery account. At Buyer 1's direction, \$39,000 of the funds were applied to Invoice
 5 33736 (Buyer 2) and \$54,000 was applied to Invoice 33767 (Buyer 1). An image of
 6 Buyer 1's email directing application of these funds appears below:

7 Dear [REDACTED]
 8 I hope you are doing well.
 9 Please confirm details of my last email dated 27th July and share the requested statements.
 10 Further, another payment of 93,000 was credited to the account today. Kindly confirm.
 11 Out of the above please split it in this manner -
 12 Invoice 033767 - 54,000
 13 Invoice 033736 - 39,000
 14 Once above figures are applied also share statements of Invoice 033767 & 033736
 15 regards,
 16 P [REDACTED]

17 **Victim 12, Victim 13, and Golf**

18 82. Golf, a resident of Florida, met someone using the name Janet Hilson
 19 ("Hilson") on a dating app. Golf and Hilson communicated using phone calls and text
 20 messages. Hilson informed Golf that she needed help receiving inheritance from her
 21 grandmother, Frieda Achgley ("Achgle"). Achgle left her property to Hilson, and
 22 Hilson's financier, Scott Adolf ("Adolf") was funding renovations on the property that
 23 Hilson inherited from Achgle. Adolf texted Golf about when funds should be expected,
 24 and provided direction to Golf concerning where to send the funds. Adolf used the same
 25 scam phone number to contact Golf that was used to contact Alpha, Echo, Foxtrot, and
 26 Hotel. Golf also used CashApp to send Bitcoin to Hilson, but primarily handled cashier's
 27 checks.

1 83. Golf opened a financial account at Bank 1, into which Golf deposited
 2 cashier's checks received from Victim 12, Victim 13, and others, during the period in
 3 which Golf conducted financial transactions at Adolf's direction.

4 84. On June 7, 2023, when the balance in Golf's Bank 1 account was \$669.17,
 5 Golf deposited a \$47,000 official check purchased by Victim 12. On June 12, 2023, when
 6 the balance on the account was \$47,669.17, Golf purchased a \$46,500 cashier's check to
 7 a third party, using the existing \$669.17 and approximately \$45,830.83 from Victim 12's
 8 cashier's check. The remaining \$1,169.17 in Golf's Bank 1 account consisted of funds
 9 defrauded from Victim 12. Golf conducted these transactions at the direction of Adolf.
 10 Victim 12 has not been located, but is believed to be a victim because they sent three
 11 cashier's checks payable to Echo and Golf, funds from which were then used to purchase
 12 cashier's checks to the Gallery and other companies.

13 85. Victim 13, a resident of Louisiana, was contacted by someone claiming to
 14 be in the FBI, who told Victim 13 that their bank accounts and accounts held by their
 15 family members might be at risk. The purported FBI agent instructed Victim 13 to send
 16 \$22,000 to Florida to help with the investigation. On June 29, 2023, Victim 13 purchased
 17 and mailed a \$22,000 cashier's check payable to Golf.

18 86. On July 3, 2023, Golf deposited Victim 13's \$22,000 cashier's check in
 19 Bank 1. Immediately prior to this deposit, the balance in Golf's Bank 1 account was
 20 \$714.29, which consisted of funds defrauded from Victim 12. In the interim period, Golf
 21 withdrew funds from the account, but made no other deposits.

22 87. On July 10, 2023, when the balance in Golf's Bank 1 account was
 23 \$22,614.29, Golf purchased a \$21,600 cashier's check, payable to the Gallery. There
 24 were no intervening deposits, so the cashier's check was purchased with approximately
 25 \$20,885.71 of funds defrauded from Victim 13 and approximately \$714.29 of funds
 26 defrauded from Victim 12. The full \$21,600 was applied to Invoice 33767 (Buyer 1).

1 88. Golf also opened a financial account at Bank 2, in which he deposited
 2 cashier's checks from Victim 12, Victim 18, and others.

3 89. On June 20, 2023, when the balance in Golf's Bank 2 was \$200, Golf
 4 deposited a \$34,632 cashier's check purchased by Victim 12. Between then and July 12,
 5 2023, Golf purchased a \$33,810 cashier's check (payable to a third party), and made
 6 three withdrawals, totaling \$300. After these transactions, approximately \$722 remained
 7 in the Bank 2 account, all of which was derived from Victim 12's cashier's check. On
 8 July 19, 2023, Golf deposited an \$18,000 cashier's check from another individual. On
 9 July 24, 2023, Golf made a cash deposit of \$1,800. On August 2, 2023, Golf purchased a
 10 \$17,700 cashier's check (payable to a third party).

11 90. On August 10, 2023, the balance in Golf's Bank 2 account was \$891.79,
 12 approximately \$722 of which was derived from Victim 12's cashier's check. The same
 13 day, Golf deposited a \$45,530 cashier's check purchased by Victim 18. On August 21,
 14 2023, Golf purchased two cashier's checks payable to the Gallery, totaling \$45,000, using
 15 the remaining funds from Victim 12 and the new funds from Victim 18. The funds from
 16 these two cashier's checks were applied to Invoice 33767 (Buyer 1).

17 ***Victim 14 and Hotel***

18 91. Victim 14 is a resident of Kentucky. Victim 14 sent a cashier's check to
 19 Hotel, after receiving a telephone call from someone claiming that Victim 14's personal
 20 information was being used by criminals. Victim 14 was instructed to send their money
 21 somewhere, which would be returned after the case was settled. On or about August 16,
 22 2023, Victim 14 purchased an official check in the amount of \$70,210, payable to Hotel.

23 92. Hotel, a resident of South Carolina, met a woman online who called herself
 24 Tina Blankenship ("Blankenship"). Blankenship told Hotel that she inherited
 25 approximately \$9 million in gold, but needed help to obtain it. Hotel was then contacted
 26 by Scott Ardolf ("Ardolf"), using the same scam phone number used to contact Alpha,
 27 Echo, Foxtrot, and Golf. Ardolf told Hotel he was assisting Blankenship. Ardolf directed

1 Hotel to open checking accounts at approximately seven specific banks and instructed
 2 Hotel to deposit checks sent to Hotel into those accounts. Adolf said the checks were to
 3 help pay Blankenship's bills, including attorney's fees, so she could receive her
 4 inheritance. Among the individuals who sent checks to Hotel were Victim 14, Victim 16,
 5 and Indigo. Adolf also directed Hotel to open a business and obtain a checking account
 6 for the business.

7 93. Hotel opened one of these bank accounts on or about August 14, 2023 and
 8 deposited \$10. The next transaction in this account was the deposit, on August 22, 2023,
 9 of the \$70,210 official check purchased by Victim 14. On August 31, 2023, Hotel
 10 purchased an official check in the amount of \$47,000, payable to the Gallery. This
 11 official check was purchased with approximately \$46,990 of funds defrauded from
 12 Victim 14, plus the \$10 existing in Hotel's account. \$32,222 of the funds were applied to
 13 Invoice 33736 (Buyer 2) and \$14,778 was applied to Invoice 33786 (Buyer 3).

14 ***Victim 15 and Indigo***

15 94. Victim 15 is a resident of Tennessee. On or about May 12, 2023, Victim 15
 16 purchased a cashier's check in the amount of \$151,000, payable to Indigo. Indigo is a
 17 resident of Colorado. On May 15, 2023, Indigo deposited Victim 15's \$151,000 cashier's
 18 check. Between May 15, 2023 and June 5, 2023, Indigo made withdrawals totaling
 19 \$151,149.76, bringing the balance on the account down to \$150.24. There were no
 20 deposits to the account during this period.

21 95. On June 9, 2023, when the balance in Indigo's account remained \$150.24,
 22 Indigo deposited a \$290,000 cashier's check, purchased by Victim 15 on June 5, 2023.
 23 The same day, Indigo made a withdrawal of \$49.99. No further deposits or withdrawals
 24 occurred between until June 23, 2023, when Indigo made two withdrawals, totaling
 25 \$135,358. On June 26, 2023, Indigo purchased a cashier's check in the amount of
 26 \$152,500, payable to the Gallery. The June 26, 2023 cashier's check was purchased
 27 entirely with funds defrauded from Victim 15.

1 96. Buyer 1 informed the Gallery of the \$152,500 payment and directed
2 application of \$44,665.92 of the funds to Invoice 33736:

3 From: [REDACTED]
4 Sent: Wednesday, June 28, 2023 12:35 PM
5 To: [REDACTED]
6 Cc: [REDACTED]
7 Subject: Re: Payment Confirmation Inv 033736 & Inv 033786 Sale 1286

8 ***EXTERNAL EMAIL***
9
10 Dear [REDACTED]
11
12 A payment of 152,500 was sent yesterday and should have credited by now. Kindly confirm.
13
14 Please apply 44,665.92 to Invoice 033736. This would complete two installments for Invoice 033736
15
16 Hold the balance with you and do not apply to any of the invoices for now and wait for my instructions.
17
18 Kindly confirm.
19
20 Regards,
21
22 [REDACTED]

15 97. On July 3, 2023, Buyer 1 directed the Gallery to apply \$24,639.31 of the
16 funds to Invoice 33942:

17
18 On Mon, Jul 3, 2023 at 11:13 PM [REDACTED] wrote:
19 Dear [REDACTED]
20
21 Please share statement for Invoice 033767.
22
23 Please use the amount \$24,639.31 from the available balance to pay the first instalment of invoice 033942.
24
25 Hold the remaining balance for now.
26
27 Regards,
28
29 [REDACTED]

1 98. Buyer 1 provided additional direction for application of the remaining
2 funds from the \$152,000 cashier's check on July 5 and 10, 2023:

3 From: [REDACTED]
4 Sent: Wednesday, July 5, 2023 9:26 AM
5 To: [REDACTED]
6 Cc: [REDACTED]
7 Subject: Re: Payment Confirmation Inv 033736 & Inv 033786 Sale 1286

8 ***EXTERNAL EMAIL***

9 Dear [REDACTED]

10 I hope you received my email of 3rd July 2023.

11 I had asked the following -

12 1. Please share the statement for Invoice 033767.
13 2. Please use the amount 24,639.31 from the available balance to pay the first installment of invoice 033942.

14 Kindly confirm the above points.

15 Finally, use the balance to settle Invoice 33801 (first installment 64,305.50) This will leave the final balance of
16 18,889.27 with you. Kindly hold onto the balance for now.

17 regards,

18 [REDACTED]
19 From: [REDACTED]
20 Sent: Monday, July 10, 2023 9:32 AM
21 To: [REDACTED]
22 Cc: [REDACTED]
23 Subject: Re: Payment Confirmation Inv 033736 & Inv 033786 Sale 1286

24 ***EXTERNAL EMAIL***

25 Dear [REDACTED]

26 I hope you are back to work. Please confirm the mail below and all its points.

27 The Final balance 18,889.27 out of the total 152,500 kindly be adjusted towards Invoice 033736.

28 Please note that a payment of 49,000 was sent on Saturday and should have been credited in the account by now.
29 Please adjust it against Second Installment of Invoice No. 033767.

30 Kindly confirm overall.

31 regards,

32 99. As directed, the Gallery applied the funds from the \$152,500 cashier's
33 check to Invoice 33736 (\$63,555.19, made up of \$44,665.92 and \$18,889.27),
34 Invoice 33801 (\$64,305.50), and Invoice 33942 (\$24,639.31).

1 ***Victim 16 and Indigo***

2 100. Victim 16, a resident of Virginia, received a call on or around July 6, 2023
 3 from someone claiming to be Sarah Jones (“Jones”), an employee at a financial
 4 institution. Jones told Victim 16 that their checking account had been breached and
 5 transferred Victim 16 to someone claiming to be Eric Morison (“Morison”), from the
 6 FTC. Morison informed Victim 16 that their investment accounts were in jeopardy, and
 7 they needed to liquidate their investments and transfer those funds into a new bank
 8 account Morison instructed Victim 16 to open.

9 101. Around the end of July 2023, Morison put Victim 16 in touch with
 10 someone claiming to be FBI employee Jason Gonzales (“Gonzales”). Victim 16’s first
 11 contact with Gonzales was on a three-way call with Morison. After the first call,
 12 Gonzales became Victim 16’s main contact. Gonzales continued to instruct Victim 16 to
 13 liquidate investments and deposit the proceeds into the new bank account and to another
 14 account Gonzales instructed Victim 16 to open at a different bank. Gonzales said
 15 Victim 16’s money was in danger and it needed to be under the supervision of the federal
 16 government for protection.

17 102. Gonzales instructed Victim 16 to purchase cashier’s checks payable to
 18 various construction companies and mail them to addresses in Colorado and South
 19 Carolina using overnight USPS mail. As directed by Gonzales, Victim 16 bought a
 20 cashier’s check for \$93,000 on July 31, 2023, payable to a company controlled by Indigo,
 21 located in Colorado. On August 25, 2023, Victim 16 bought another cashier’s check for
 22 \$120,000, also payable to a company controlled by Indigo.

23 103. Indigo opened an account at US Bank on June 27, 2023 with a cash deposit
 24 of \$300. On August 3, 2023, when the balance on the account was \$200, Indigo deposited
 25 the \$93,000 cashier’s check purchased by Victim 16. Between August 3, 2023 and
 26 August 28, 2023, there were five withdrawals from Indigo’s account, totaling \$92,896,
 27 and no other deposits.

1 104. On August 29, 2023, when the account's balance was \$304.00, Indigo
 2 deposited the \$120,000 cashier's check purchased by Victim 16. This deposit brought the
 3 balance on the account to \$120,304.00, all of which was defrauded from Victim 16.
 4 There were no additional deposits to the account prior to Indigo's purchase of a \$40,700
 5 cashier's check, payable to the Gallery. All of the funds used to purchase this cashier's
 6 check were defrauded from Victim 16. \$11,122.81 of these funds were allocated to
 7 Invoice 33786 (Buyer 3); \$29,305.50 was allocated to Invoice 33801 (Buyer 2); and
 8 \$271.69 was allocated to Invoice 33942 (Buyer 1).

9 ***Victim 17 and Juliet***

10 105. Victim 17 is a resident of Indiana. On or about August 28, 2023, Victim 17
 11 purchased a \$60,000 cashier's check, payable to Juliet. Juliet is a resident of Michigan.
 12 Juliet deposited Victim 17's cashier's check on August 30, 2023, eight days after opening
 13 a new bank account. The next two transactions in the account were the purchase of a
 14 cashier's check on September 5, 2023 for \$45,000 and the purchase of a cashier's check
 15 on September 6, 2023 for \$14,400, both payable to the Gallery. \$24,357 of these funds
 16 were applied to Invoice 33942 (Buyer 3) and \$35,043 was applied to Invoice 33786
 17 (Buyer 3). All of the funds were defrauded from Victim 17.

18 ***Other Payments Applied to These Five Invoices***

19 106. Not all payments applied to these five invoices for the purchase of the
 20 Defendant Property have been identified as fraud proceeds. Money orders, with little
 21 identifying information regarding purchasers, were deposited to the Gallery account and
 22 applied to these invoices. Other payments appear to have been made toward the same
 23 invoices on behalf of the Buyers, which were made using bank transfers, which generally
 24 referenced individual invoice numbers, instead of cashier's checks. All identified victim
 25 funds were deposited directly to the Gallery account in the form of cashier's checks. The
 26 cashier's checks did not contain references to invoices.

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1 ***Seizure of the Defendant Property***

2 107. On or about February 1, 2024, the FBI executed a properly authorized
 3 forfeiture seizure warrant on the Gallery and seized the Defendant Property.

4 **X. CLAIM FOR RELIEF**

5 108. As required by Supplemental Rule G(2)(f), the facts set forth in this
 6 Verified Complaint support a reasonable belief that the United States will be able to meet
 7 its burden of proof at trial. More specifically, there is probable cause to believe that the
 8 Defendant Property is forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) because it
 9 constitutes or is derived from proceeds of Mail Fraud, in violation of 18 U.S.C. § 1341,
 10 Wire Fraud, in violation of 18 U.S.C. § 1343, and Conspiracy to Commit Mail and Wire
 11 Fraud, in violation of 18 U.S.C. § 1349, and pursuant to 18 U.S.C. § 981(a)(1)(A)
 12 because it is property involved in Money Laundering and Conspiracy to Commit Money
 13 Laundering, in violation of 18 U.S.C. §§ 1956 and 1957.

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1 WHEREFORE, the United States respectfully requests:

2 1. A warrant be issued for the arrest of the Defendant Property;

3 2. Due notice be given to all interested parties to appear and show cause why

4 the Defendant Property should not be forfeited;

5 3. Judgment be entered declaring the Defendant Property be condemned and

6 forfeited to the United States for disposition according to law; and,

7 4. The United States be granted such other and further relief as this Court may

8 deem just and proper.

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10 DATED this 24th day of June, 2024.

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12 Respectfully submitted,

13 TESSA M. GORMAN
14 United States Attorney

15 s/Krista K. Bush

16 KRISTA K. BUSH
17 Assistant United States Attorney
United States Attorney's Office
18 700 Stewart Street, Suite 5220
Seattle, Washington 98101
Phone: (206) 553-2242
Fax: (206) 553-6934
Krista.Bush@usdoj.gov

VERIFICATION

I, Andrew Cropcho, am a Special Agent (“SA”) with the Federal Bureau of Investigation (FBI) and have been since May of 2018. I am currently assigned to the Seattle Field Office. My primary duties include investigating violations of federal law, including corporate fraud, securities fraud, government program fraud, and healthcare fraud. Those duties include investigating instances of wire fraud being used for financial gain at the expense of others, and the laundering of those gains to conceal the true source and nature from which they were derived. Before my career as an FBI Special Agent, I was employed by a large public accounting firm for over three years and, as part of my employment, I examined financial information of clients to determine their accuracy, reliability, and sources.

12 In the scope of my duties as an FBI Special Agent, within the meaning of Rule
13 41(a) of the Federal Rules of Criminal Procedure, that is, a government agent engaged in
14 the enforcement of the criminal laws of the United States, I am authorized to request the
15 issuance of a federal seizure warrant.

16 I am an investigating or law enforcement officer of the United States within the
17 meaning of 18 U.S.C. § 2510(7), in that I am empowered by law to conduct
18 investigations and to make arrests for federal offenses. I furnished the investigative facts
19 contained in the foregoing Verified Complaint for Forfeiture *In Rem*. The investigative
20 facts are based on personal knowledge I obtained from my involvement in the underlying

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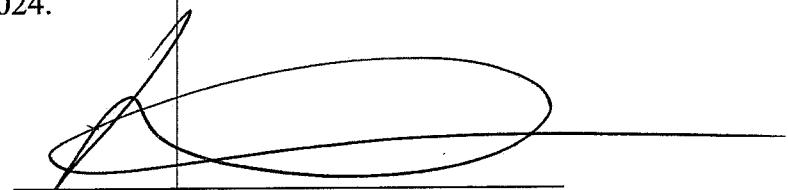
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1 investigation, my review of the relevant investigative material, other federal agencies and
2 law enforcement officers involved in the investigation, other reliable official Government
3 sources, and my own training and experience.

4 I hereby verify and declare, under penalty of perjury pursuant to 28 U.S.C. § 1746,
5 that I have read the foregoing Verified Complaint for Forfeiture *In Rem*, that I know its
6 contents, and that the facts it contains are true and correct to the best of my knowledge.
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8 Executed this 24th day of June, 2024.



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10
11 ANDREW CROPCHO
12 Special Agent
13 Federal Bureau of Investigation
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